

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GRAHAM CHASE ROBINSON,

*Plaintiff,*

- against -

ROBERT DE NIRO and  
CANAL PRODUCTIONS, INC.,

*Defendants.*

Case No.: 1:19-cv-09156 (LJL) (KHP)

**DEFENDANTS' NOTICE OF  
MOTION FOR SANCTIONS**

**PLEASE TAKE NOTICE**, that upon the annexed Declaration of Gregory R. Bennett, sworn to on the 1st day of April 2022, and the exhibits annexed thereto, the accompanying memorandum of law, and upon all the papers and proceedings heretofore had herein, Defendants Robert De Niro and Canal Productions, Inc. hereby move, pursuant to Fed. R. Civ. P. 11 and 28 U.S.C. § 1927, and in accordance with the Court's January 20, 2022 Order (ECF #[142](#)) and March 22, 2022 Order (ECF #[182](#)), for an Order (i) dismissing, with prejudice, Plaintiff's equal pay claims under federal and state law (the "EPA Claims") and Plaintiff's claim seeking overtime compensation under the New York Labor Law (the "OT Claim") (collectively, the "Frivolous Claims"); (ii) imposing sanctions on Plaintiff and her counsel for maintaining the Frivolous Claims without any colorable basis in law or fact throughout the discovery phase of this action; (iii) awarding Defendants their attorneys' fees and costs incurred in defending against the Frivolous Claims, including, but not limited to, ESI-related costs, and (iv) such other and further relief as this Court deems just and proper.

Dated: Hawthorne, New York  
April 1, 2022

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*Robert De Niro*

Dated: New York, New York  
April 1, 2022

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